

David M. Cook, Bar # 7043  
Attorney for the Debtor(s)  
716 East 4500 South, Ste. N240  
Salt Lake City, UT 84107  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

IN RE: Allen Kerr  
Gina Torres

Address: 270 S. 450 W., Layton, UT 84041  
Last four digits of Social Security No:  
xxx-xx-0451 and xxx-xx-1518

Debtor(s).

Bankruptcy No. 12-29200  
Chapter 13  
Filed Electronically

**NOTICE OF DEBTORS MOTION TO APPOINT AGENT FOR SALE OF PROPERTY  
OF THE ESTATE, FOR APPROVAL OF SHORT SALE OF DEBTORS' INTEREST IN  
REAL PROPERTY, AND FOR ATTORNEY'S FEES AND NOTICE OF OPPORTUNITY  
FOR HEARING**

**(Objection Deadline: May 5, 2015)**

**(Hearing Date: May 13, 2015)**

The Debtors, Allen Kerr and Gina Torres, have filed a Motion to Appoint Agent for Sale of Property of the Estate, for Approval of Short Sale of Real Property, and for Attorney's Fees.

**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

Debtors seek to approve the appointment of a real estate agent and for the short sale of their real estate and requests attorney's fees.

**NO HEARING WILL BE CONDUCTED ON THIS MOTION/APPLICATION/  
OBJECTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF  
THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.**

If you do not want the Court to grant the relief requested in the Motion then you or your attorney must:

1. On or before **May 5, 2015**, file with the Bankruptcy Court a written Objection,

explaining your position, at:

United States Bankruptcy Court  
350 South Main Street, Room 301  
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before **May 5, 2015**. You must also mail a copy to the undersigned counsel at David M. Cook, Attorney at law, 716 East 4500 South, Ste. N240, Salt Lake City, UT 84107.

**(2)** attend a hearing on **May 13, 2015**, at **11:00** in Courtroom 369, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, UT 84101 **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion without hearing.

Dated this 8<sup>th</sup> day of August, 2012.

/s/ David M. Cook  
Attorney for the Debtor

**CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)**

I hereby certify that on April 9, 2015, I electronically filed the foregoing Notice of Opportunity for Hearing and Objection to Proof of Claim No. with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

Kevin R. Anderson	U.S. Trustee
Chapter 13 Trustee	Via ECF
Via ECF	

**CERTIFICATE OF SERVICE –MAIL, OTHER**

I hereby certify that on April 9, 2015, I caused to be served a true and correct copy of the foregoing Notice of Opportunity for Hearing and Objection to Proof of Claim No. as follows:

  X   Mail Service - By regular first class United States mail, postage fully pre-paid, addressed to:

Allen Kerr  
Gina Torres  
270 S. 450 W.  
Layton, UT 84041

on this April 18, 2015.

/s/ David M. Cook

Label Matrix for local noticing 1088-2 Case 12-29200 District of Utah Salt Lake City Sat Apr 18 06:06:53 MDT 2015	ADT Security Services P.O. Box 650485 Dallas, TX 75265-0485	American InfoSource LP as agent for Midland Funding LLC PO Box 268941 Oklahoma City, OK 73126-8941
American InfoSource LP as agent for T Mobile/T-Mobile USA Inc PO Box 248848 Oklahoma City, OK 73124-8848	Kevin R. Anderson tr 405 South Main Street Suite 600 Salt Lake City, UT 84111-3408	Bank of America 2424 Us Hwy 6 And 50 Grand Junction, CO 81505
Bonneville Billing and Collections, Inc P.O. Box 150621 Ogden, UT 84415-0621	CITI 701 East 60th St North Sioux Falls, SD 57104-0493	Capital Management Services, Inc. 726 Exchange Street Suite 700 Buffalo, NY 14210-1464
Center One Financial P.O. Box 70898 Charlotte, NC 28272-0898	CenterOne Financial Services P.O. Box 4422 Bridgeton, MO 63044-0422	Circuit City 7795 West Flagler Street Miami, FL 33144-2359
David M. Cook 716 East 4500 South Suite N240 Salt Lake City, UT 84107-3619	DRESSWELL CLEANERS c/o Bonneville Collections PO Box 150621 Ogden, UT 84415-0621	Davis Hospital and Medical Center 1600 West Antelope Drive Layton, UT 84041-1120
Davis North Hospital P.O. Box 277273 Atlanta, GA 30348-7273	(p)DELL FINANCIAL SERVICES P O BOX 81577 AUSTIN TX 78708-1577	Discover P.O. Box 6103 Carol Stream, IL 60197-6103
Discover Bank DB Servicing Corporation PO Box 3025 New Albany, OH 43054-3025	East Bay Funding, LLC its successors and ass as assignee of B-Line, LLC Resurgent Capital Services PO Box 288 Greenville, SC 29602-0288	Edwin B. Parry P.O. Box 25727 Salt Lake City, UT 84125-0727
Emergency Phys Integrated Care (EPIC) P.O. Box 96398 Oklahoma City, OK 73143-6398	Emergency Physicians Integrated Care P.O. Box 96398 Oklahoma City, OK 73143-6398	Express Recovery 2790 Decker Lake Drive Salt Lake City, UT 84119-2057
Express Recovery Services, Inc. P.O. Box 26415 Salt Lake City, UT 84126-0415	Exxon P.O. Box 6530 The Lakes, NV 88901-6530	Scott D. Fink Weltman Weinberg & Reis 323 W. Lakeside Avenue Suite 200 Cleveland, OH 44113-1099
First Source Advantage, LLC 205 Bryant Woods South, Buffalo, NY 14228-3609	GOLDENWEST CREDIT UNION c/o Bonneville Collections PO Box 150621 Ogden, UT 84415-0621	GRAYPOINT AUTO FINANCE CORP, IT'S SUCCESSORS AND ASSIGNS Weltman, Weinberg and Reis Co., L.P.A., 323 W. Lakeside Avenue, Cleveland, OH 44113-1099

Graypoint Auto Finance Corp  
P.O. Box 70898  
Charlotte, NC 28272-0898

HSEC Card Services  
P.O. Box 80084  
Salinas, CA 93912-0084

(P)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Intermountain Healthcare  
Patient Financial Services  
P.O. Box 410400  
Salt Lake City, UT 84141-0400

Jay V Barney, P.C.  
404 East 4500 South  
Suite A-38  
Salt Lake City, UT 84107-5051

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

Jorge Zapata  
859 Washington Blvd. Suite #2  
Ogden, UT 84404-4972

Allen Shayne Kerr  
270 S. 450 W.  
Layton, UT 84041-3675

Knight Adjustment Bureau  
404 East 4500 South  
Suite A34  
Murray, UT 84107-2710

LDS Hospital  
Remittance Processing  
P.O. Box 410400  
Salt Lake City, UT 84141-0400

Mervyn's  
P.O.Box 960013  
Orlando, FL 32896-0013

Mountain Medical  
P.O. Box 29684  
Phoenix, AZ 85038-9684

Mountain West Anesthesia  
1954 East Fort Union Blvd  
Suite #102  
Salt Lake City, UT 84121-6883

Mountainland Collections  
P.O. Box 1280  
American Fork, UT 84003-6280

Omnium Worldwide, Inc  
PO Box 956842  
Saint Louis, MO 63195-6842

Outsource Receivable  
P.O. Box 166  
Ogden, UT 84402-0166

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Qwest Communications  
Bankruptcy Group  
P.O. Box 5508  
Bismarck, ND 58506-5508

Qwest Communications  
PO Box 29060  
Phoenix, AZ 85038-9060

RC Willey Home Furnishings  
P.O. Box 65320  
Attn: Bankruptcy Department  
Salt Lake City, UT 84165-0320

RCO  
7171 Mercy Road  
Suite 150  
Omaha, NE 68106-2611

Ramon Torres  
2665 North 2525 West  
Farr West, UT 84404-8709

Rocky Mountain OB/GYN  
1580 W Antelope Dr # 290  
Layton, UT 84041-1179

SFC-Central Bankruptcy  
P.O. Box 1893  
Spartanburg, S.C. 29304-1893

Second District Court  
Case No. 090602303  
425 N. Wasatch  
Layton, UT 84041-3254

Second District Court  
Case No. 090800086  
805 South Main  
Bountiful, UT 84010-6480

Stephen Elggren, LLC  
PO Box 900790  
7390 South Creek Road, Suite 201  
Sandy, UT 84093-6123

Tanner Clinic  
2121 N 1700 W  
Layton, UT 84041-1185

Target National Bank  
c/o Target Credit Services  
PO Box 1581  
Minneapolis, MN 55440-1581

(p)CITIBANK  
PO BOX 790034  
ST LOUIS MO 63179-0034

Third District Court

Case No. 120408718

8080 South Redwood Road, Suite 1701

West Jordan, UT 84088-4654

Gina Torres

270 S. 450 W.

Layton, UT 84041-3675

UHEAA

P.O. Box 45202

Salt Lake City, UT 84145-0202

United States Trustee  
Ken Garff Bldg.  
405 South Main Street  
Suite 300  
Salt Lake City, UT 84111-3402

University of Utah  
1901 E. South Campus Drive  
1129 Annex Building  
Salt Lake city, UT 84405

Utah State Tax Commission  
Attn: Bankruptcy Unit, Taxpayer Srv Div  
210 North 1950 West  
Salt Lake City, UT 84134-3340

Well's Fargo Financial Bank  
P.O. Box 5943  
Sioux Fall, SD 57117-5943

Wells Fargo Bank NA  
PO Box 10438  
Des Moines IA 50306-0438

Wells Fargo Financial  
P.O BOX 98784  
Las Vegas, NV 89193-8784

Wells Fargo Financial Bank  
P.O. Box 5943  
Sioux Falls, SD 57117-5943

Wells Fargo Financial Utah, Inc  
PO Box 10317  
Des Moines IA 50306-0317

Wells Fargo Home Mortgages Inc.  
P.O. Box 5708  
CPI#708)  
Springfield, OH 45501-5708

David M x2Cook  
David M. Cook, P.C.  
716 East 4500 South  
Suite N240  
Salt Lake City, UT 84107-3619

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Dell Financial Services  
Payment Processing Center  
PO Box 6403  
Carol Stream, IL 60197-6403

(d)Dell Financial Services, LLC  
Resurgent Capital Services  
PO Box 10390  
Greenville, SC 29603-0390

I.R.S.  
P.O. Box 7704  
San Francisco, CA 94120-7704

Jefferson Capital Systems LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-9617

Portfolio Recovery Associates, LLC  
PO Box 41067  
Norfolk VA 23541

The Home Depot  
P.O. Box 6028  
The Lakes, NV 88901-6028

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Graypoint Auto Finance Corp.

(d)Rocky Mountain OB/GYN  
1580 W Antelope Dr # 290  
Layton, UT 84041-1179

End of Label Matrix  
Mailable recipients 72  
Bypassed recipients 2  
Total 74